



Wyoming
DEPARTMENT OF Agriculture

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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

December 21, 2021

Mr. Mark Foster
Acting District Ranger
Pinedale Ranger District
Bridger-Teton National Forest
PO Box 220
Pinedale, WY 82941

Dear Mr. Foster,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Environmental Assessment (EA) for the Elk Ridge Complex Rangeland Supplementation Project on the Pinedale Range District of the Bridger-Teton National Forest (BTNF)

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The WDA appreciates the BTNF's concerted effort to utilize the vacated Elk Ridge Complex for cattle grazing. We offer the following comments on the EA in support of continuing domestic livestock grazing:

The EA states the Elk Ridge Complex allotments would allocate enough forage for 603 cow/calf pairs. While we support grazing cattle pairs, we also urge the BTNF include yearlings and ensure the ability for grazing permittees to interchange the class of livestock as needed. When WDA sent scoping comments in June 2021, we urged the BTNF to analyze the impacts of losing 603 Animal Unit Months (AUMs) by simply converting forage use from sheep to cattle. As proposed and analyzed, the BTNF has permanently removed 603 AUMs from the forest, which WDA does not support.

The EA analyzes the Elk Ridge Complex inconsistently throughout the document regarding if the decision is for four separate allotments or as one allotment with different "pastures." This clarification is important not only for the analysis, but also regarding the requirement to develop separate Allotment Management Plans (AMPs). Furthermore, the AMPs would provide the details on how the permittees will manage their cattle across the project area.

As written, there are some concerns the EA reads similar to a forage reserve given there are no specifics for how the existing grazing permittees will utilize the Elk Ridge Complex on an annual basis. We believe it's imperative for the BTNF to distinguish the Elk Ridge Complex as an active allotment(s) and not intermittently as a typical forage reserve. Forage reserves generally have very limited use often based on extenuating circumstances, such as a natural disaster. We insist the Elk Ridge Complex is actively grazed annually with input from the permittees to meet desired conditions and provide them flexibility with neighboring allotments and permits.

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BTNF Elk Ridge Complex Rangeland Supplementation Project

12/21/21

Page 2 of 2

We appreciate the opportunity to comment and look forward to working with your staff on this project. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,



Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
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